

IN THE
 COURT OF CRIMINAL APPEALS OF TEXAS

MICHAEL RAY SENN
Appellant,

VS.

THE STATE OF TEXAS
Appellee.

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No. PD-1265-18

FILED
 COURT OF CRIMINAL APPEALS
 5/30/2019
 DEANA WILLIAMSON, CLERK

MOTION FOR EXTENSION OF TIME
 TO FILE APPELLANT'S BRIEF

TO THE HONORABLE JUDGES OF SAID COURT:

MICHAEL RAY SENN, Appellant in the above-styled and numbered cause, by and through his attorney of record, WILLIAM R. BIGGS, hereby moves for an extension of time to file Appellant's brief. He would respectfully show the Court the following.

1. Current Deadline for filing Appellant's Brief: June 9, 2019
2. Length of Time Requested for the Extension: 30 days
3. Number of Prior Extensions of Time: None
4. Counsel needs additional time to review prepare Appellant' Brief. Counsel

has been pressed on a number of other state and federal criminal matters currently pending in Tarrant County, the United States District Court for the Northern District of Texas, Fort Worth Division, the United States Court of Appeals for the Fifth Circuit, and the Second Court of Appeals. Finally, Counsel also manages a large number cases pending in trial courts in Tarrant County, TX and the United States District Court for the Northern District of Texas which have required his attention during the period.

5. The State does not oppose the motion.
6. Appellant is incarcerated.

WHEREFORE, PREMISES CONSIDERED, Appellant prays that this Court will extend the time within which to file Appellant's Brief by 30 days.

Respectfully submitted,

/s/ William R. Biggs
William R. Biggs
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CERTIFICATE OF CONFERENCE

On May 29, 2019, I, WILLIAM R. BIGGS, or my agent, hereby certify that I conferred with the Tarrant County District Attorney's Office regarding the foregoing motion and the State is UNOPPOSED to the motion.

/s/ William R. Biggs
WILLIAM R. BIGGS

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2019, I will file a copy of the foregoing electronically. Ms. Helena Faulkner will receive electronic notice of this filing at coaappellatealerts@tarrantcounty.com. A copy of this motion also will be sent via USPS mail to Ms. Helena Faulkner, Tarrant County District Attorney's Office, 401 W. Belknap, 4th Floor, Fort Worth TX 76196. Finally, a copy of this motion will be sent to Michael Senn, TDCJ# 02004798, Carole S. Young Medical Facility, 5509 Attwater Avenue, Dickinson, Texas 77539.

/s/ William R. Biggs

WILLIAM R. BIGGS